

2601 RESIDENTIAL CERTIFICATION QUALITY IMPROVEMENT - SITE REVIEWS

Chapter: **Provider Management**

Section: **Certification**



New Hampshire Division for Children, Youth and Families Policy Manual

Policy Directive: **15-47**

Effective Date: **August 2015**

Scheduled Review Date:

Approved:

A handwritten signature in black ink, reading "Lorraine Bartlett", is written over a horizontal line.

Lorraine Bartlett, DCYF Director

Related Statute(s): [RSA 151](#), [RSA 169-C](#), and [RSA 170-G:4 XVIII](#)
Related Admin Rule(s): [He-C 4001](#), [He-C 6350](#), [He-C 6420](#), and [He-P 807](#)
Related Federal Regulation(s): [P.L. 108-79 PREA](#)
PREA Standards: [115.311 \(b\)](#)

Related Form(s): **FORM 2601**, and **FORM 2601R**
Bridges' Screen(s) and Attachment(s):

The Division for Children, Youth and Families (DCYF) and approved programs must work collaboratively to ensure that youth in our care and under our supervision receive residential services in compliance with the applicable rules and best practices in juvenile justice and child protection.

Purpose

This policy establishes DCYF's Quality Improvement function for monitoring certified residential treatment programs to ensure that quality residential services are delivered in compliance with Department of Health and Human Services Administrative Rules, and the federal Prison Rape Elimination Act of 2003 (PREA) if applicable to the residential treatment program.

Definitions

"DCYF" or the **"Division"** means the DHHS Division for Children, Youth and Families.

"PREA" means the standards enacted on August 20th, 2012 and enforced by the U.S. Department of Justice to eliminate prison rape pursuant to the Prison Rape Elimination Act of 2003.

"Residential Treatment Program" means the model and implementation of services to meet the treatment and supervision needs of the children per RSA 170-G:4, XVIII, and provide 24 hour care of children 365 days a year including all of the employees therein, and is one of the following categories of certification:

- (1) Assessment treatment program;
- (2) Intensive treatment program;
- (3) Intermediate treatment program;
- (4) Nursing home;
- (5) Rehabilitation program;
- (6) Shelter care program; and
- (7) Substance abuse treatment program.

"SYSC," or the **"John H. Sununu Youth Services Center,"** or the **"Youth Detention Services Unit"** means the architecturally secure juvenile treatment facility administered by the DHHS Division for Children, Youth and Families for committed juveniles and detained youth, and for NH youth involved with the NH court system prior to their adjudication.

Policy

- I. DCYF has designated a Community Programs Specialist in the Bureau of Community and Family Supports to coordinate and conduct formal on-site reviews of each certified residential treatment program a minimum of once every two years with a technical assistance during the "off year."
 - A. The purpose of these reviews is to assess program performance and monitor compliance with DHHS rules He-C 6350 "Certification for Payment Standards for Residential Facilities," He-C 6420 "Medicaid Covered Services," as well as program effectiveness, outcomes and overall quality of services of the program pursuant to RSA 170-G:4, VIII.
 - B. The Community Programs Specialist shall also coordinate and work collaboratively with the Sununu Youth Services Center's PREA Coordinator in order to ensure PREA eligible facilities adhere to the PREA Standards for Juvenile Facilities.
- II. PREA Determination:
 - A. DCYF shall designate an upper-level, agency-wide staff to fulfill the role of PREA Coordinator. This staff shall have sufficient time and authority to develop, implement, and oversee DCYF efforts to comply with the PREA Standards for Juvenile Facilities, for SYSC and eligible residential treatment programs as determined by the Department (115.311 (b)).
 - B. The Community Programs Specialist shall ensure all certified residential treatment programs maintain and report the type of placement for youth in their care upon the request of the PREA Coordinator and Community Programs Specialist. This shall include data for all placements accepted by the program whether from DCYF or other entities.
 1. For this policy, types of placement reported shall be for:
 - (a) Delinquency Offenses;
 - (b) Status Offenses (i.e. CHINS in New Hampshire);
 - (c) Abuse and Neglect
 - (d) Educational Purposes; or
 - (e) Other Type of Placement.
 2. The Community Programs Specialist and PREA Coordinator shall jointly determine PREA eligibility for residential treatment programs.
 - (a) The criteria for PREA eligibility will be based upon the PREA Standards and information the programs report regarding their population.

- (b) Any program which meets the criteria for PREA eligibility shall be required to comply with PREA.

III. Procedure For Residential Treatment Program Site Visits:

- A. Bi-annual program site visits for certified in-state programs will be conducted by a team facilitated and coordinated by the Community Programs Specialist.
 - 1. Review Team Membership –The Community Programs Specialist will work with the Bureau Chiefs, or designee(s), in order to determine the site review team members.
 - (a) Review teams may include a variety of participants dependent upon the program size, treatment specialty, population characteristics, location and current status of the program being reviewed and shall be at the discretion of the Community Programs Specialist.
 - (b) The review team may include:
 - (1) A Juvenile Probation and Parole Supervisor or Juvenile Probation and Parole Officer designee, at a minimum;
 - (2) A member of the Bureau of Organizational Learning and Quality Improvement;
 - (3) An individual with experience in assuring permanency and adolescent development programming;
 - (4) A parent partner/consultant and/or a youth;
 - (5) Other program specialists who may have an interest in residential programming such as JDAI, the PREA Coordinator, or Detention Compliance Monitor; and
 - (6) Others as determined by the Community Programs Specialist.
 - 2. The Community Programs Specialist is responsible for:
 - (a) Generating an annual calendar of anticipated visits and coordinating the schedules with the programs and team members throughout the year.
 - (b) Arranging logistics for the site visit with the residential treatment program and acting as the liaison with the programs and the review team. This is at a minimum six weeks in advance of an on-site visit.
 - (c) Ensuring each reviewer has the following materials at least one week before the on-site visit (this includes identifying if the materials were previously provided):
 - (1) Current Residential Certification Standards via He-C 6350;
 - (2) Medicaid regulations via He-C 6420;

- (3) Prior site review or technical assistance reports as necessary;
 - (4) Other materials the Community Programs Specialist deems helpful (i.e. consumer surveys).
- (d) Informing team members of the draft agenda within 48 hours of the review with potential assignments for them.
- (e) Disseminating instructions to the residential treatment program as to how to prepare for the site review, which includes a request for completion of the following materials:
 - (1) The names and address of parents of children they have served in the last year;
 - (2) The names of JPPOs and CPSWs of children they have served in the last year;
 - (3) Staff survey responses based on the survey link provided;
 - (4) Any updated policies necessary;
 - (5) Any updates to the program description which was received as a part of annual certification;
 - (6) Youth Survey letter and Youth Surveys which will be facilitated by the program and returned to the Community Programs Specialist at least 2 weeks prior to the review; and
 - (7) A thorough review of the Division's Practice Model.
- (f) Mailing consumer surveys based on the data provided by the program.
 - (1) The surveys are provided to CPSWs/JPPOs who have placed youth in the program within the past year.
 - (2) Separate surveys are mailed to parents/guardians who have had a youth in the program in the past year.
 - (3) Youth surveys will be facilitated by the residential treatment program and returned to the Community Programs Specialist.
 - (4) Survey results will be shared with the review team members and program, and be a part of the site review.
- (g) Conducting the site review between one and three days dependent upon the size of the residential facility and the type of program. Included in the site review is typically:
 - (1) An entrance interview to review: the current program model; changes since the last review or visit; permanency, normalcy, adolescent development, and age and developmentally appropriate

activities taking into consideration the Reasonable and Prudent Parent Standard; and outcomes of statistics and surveys;

- (2) A tour of the program which will also include compliance with the JJDP Act;
 - (3) A review of Human Resources' files in order to determine compliance with He-C 6350, including staff training on principles and practices child care;
 - (4) Interviews with youth, staff, clinicians, family workers and other specialties;
 - (5) Youth file reviews in order to determine success of outcomes and compliance with He-C 6420 and He-C 6350; and
 - (6) An exit interview to preview the findings of the visit.
 - (7) During some reviews the program and the Community Programs Specialist may request case presentations by the program's clinician and staff team in order to support outcomes.
- (h) Compiling the information provided by team members into a final report that includes any requests for Corrective Action Items to the program after the conclusion of the site review.
 - (i) Documenting and forwarding copies of the final report to the residential treatment program and appropriate administrators at DCYF and the DHHS Child Care Licensing Unit.
 - (j) Reviewing the residential treatment program's Corrective Action Plan in consultation with team members as needed and preparing written correspondence in order to approve the corrective action plan, request clarification, or offer assistance to the program to come into compliance.
 - (k) Providing technical assistance visits annually subsequent to the site review and corrective action plan in (j) in order to support continued compliance referenced in IV below.
 - (l) Providing feedback regarding each review team member's performance during site visits as necessary.
 - (1) Should a performance issue develop that impacts the team's ability to perform its function then the Community Programs Specialist will consult with the team member, and their supervisor if necessary.
 - (2) If an appropriate resolution cannot be achieved then the Community Programs Specialist will consult with the DCYF Director or designee for appropriate resolution.

3. Review Team Member Responsibilities:

- (a) Commitment – Team members accepting a position on a review team are expected to commit for the duration of the review. Reviewers who have accepted a position but later determine they are not able to meet this commitment must contact the Community Programs Specialist in order to assist the Community Programs Specialist to find an approved replacement.
- (b) Tasks – Team members must complete assigned tasks and remain on-site for the duration of their commitment for the review. The Community Programs Specialist must approve any exceptions.
- (c) Participation – Team members will be active participants in the site visit. Team members are expected to provide:
 - (1) Professional and respectful assessments and observations based on their program area of expertise as it relates to the goals of the on-site review;
 - (2) Identification of specific program component’s strengths and challenges;
 - (3) Best practice suggestions or program models that will assist in improving program’s practice; and
 - (4) Identification of compliance or performance issues at the Exit Interview.
- (d) Reports – Review team members will provide the Community Programs Specialist verbal observations made throughout the process and will be provided an opportunity to share these at the exit interview. In addition, team members may be requested to provide their observations or a summary of their observations in writing to the Community Programs Specialist.

IV. Off-year technical assistance visits shall be made by the Community Programs Specialist to assess the status of certified programs and monitor the implementation of any Corrective Action Plan as referenced in III-A:2(k) above.

V. The quality improvement process for out-of-state facilities shall be based on the following components monitored by the Community Programs Specialist:

- A. Annual file review via the Certification Renewal Application (Form 2601R).
- B. Periodic reviews of the services by inquiring with the field staff, supervisors, or Field Administrators, or the program directly in order to assure quality of services.
- C. Review of any programmatic or compliance concerns known by the Community Programs Specialist that may affect the quality of services.
 - 1. DCYF may provide guidance and consultation via the phone or email in order to assure quality services;

2. DCYF may conduct an on-site visit as part of the certification renewal process, a quality assurance visit, or an ongoing technical assistance visit; and/or
 3. The facility's state regulatory agency may be contacted for information related to the operation of the facility and the status of any program improvement plans in effect to correct deficiencies.
- VI. The ultimate goal of the quality improvement process is to ensure children in the care, or under the supervision, of the Division, and their families receive the highest quality services possible based on a residential treatment program's compliance with departmental rules and state laws. The following desired outcomes have been identified to ensure program performance:
- A. Analytical reports with input from subject matter experts who make up the review team. This should enable DCYF to more effectively identify and track trends across programs;
 - B. To provide technical support to residential treatment programs so that their programs are delivering best practices with the youth they serve;
 - C. To ensure certified residential treatment programs are in support of the Division's mission and Practice Model;
 - D. To ensure compliance with applicable law pursuant to RSA 170-G.
 - E. To ensure compliance with applicable rules in accordance with He-C 6350 and He-C 6420;
 - F. To ensure compliance with the Reasonable and Prudent Parent Standards in SSA 471.
 - G. To evaluate practice efficacy, performance, and assess desired outcomes;
 - H. To seek consumer satisfaction with the services offered by the program; and
 - I. To deliver a timely, written report of findings with recommendations to the program.

Practice Guidance

What happens if there is a residential treatment program in-state, which is certified, that has not accepted placement within the last year or more?

- Programs shall all be visited annually. If a formal site review is not possible as a result of the Division not making placement in the year, services shall still be reviewed to the best of the team's ability. It is not necessary to have a large site review team for this site review, and it may only be necessary to have the Community Programs Specialist do the site review.

How far back should file reviews go to assure quality assurance at the program?

- It would be ideal to look at a time frame in which it would be reasonable to assess changes over time, in essence since the last technical assistance or site review, whichever was of the latter. This is typically a file review of the last seven to eight months.

How do I best prepare parents and youth who will be a part of the team?

- The Community Programs Specialist has a presentation/training prepared for situations of this nature so that people can feel more comfortable in their role.